

Response to the

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Federal Communications Commission

Notice of Proposed Rule Making

Federal-State Joint Board on Universal Service

CC Docket Number 96-45

Joint Statement

submitted by

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**Pennsylvania Library Association  
Pennsylvania School Librarians Association  
Pennsylvania Citizens for Better Libraries**

"...is intended to ensure that health care providers for rural areas, elementary and secondary school classrooms, and libraries have affordable access to modern telecommunications services that will enable them to provide medical and educational services to all parts of the nation.

The ability of K-12 classrooms, libraries and rural health care providers to obtain access to advanced telecommunications services is critical to ensuring that these services are available on a universal basis. The provisions of subsection (h) of section 254 will help open new worlds of knowledge, learning and education to all Americans--rich and poor, rural and urban. They are intended for example, to provide the ability to browse library collections, review the collections of museums, or find new information on the treatment of an illness, to Americans everywhere via schools and libraries. This universal access will assure that no one is barred from benefiting from the power of the Information Age."

--- Joint Explanatory Statement of the Committee of Conference  
Telecommunications Competition and Deregulation Act of 1995

The above statement, in simple and straightforward terms, spells out several critical principles that Members of Congress agreed were fundamental elements to be included in the 1995 Telecommunications Act. These elements are designed to preserve and protect the public's interest in current and future educational opportunities available on the "information superhighway", especially as the new act opens up the telecommunications market to freer, more open competition.

Pennsylvania's library community strongly agrees with the perspective articulated by the Congress that, taken together, libraries make up a fundamental educational building block on which is built the economic and intellectual future of our nation. Moreover, it is abundantly clear that affordable access to the ever-increasing world of information available on-line will be an essential factor for learning well into the future.

This being the case, Pennsylvania's library community has joined together to offer a unified perspective on the impact and importance of the universal service and discounted rates for Pennsylvania's schools and libraries. Joining in this effort are:

- **The Pennsylvania Library Association (PaLA)** representing librarians, support staff, trustees, and volunteers in Pennsylvania's more than 1500 public, academic, and special libraries;
- **The Pennsylvania School Librarians Association (PSLA)** representing librarians and library media specialists in more than 5000 public, private and parochial schools;
- **Pennsylvania Citizens for Better Libraries (PCBL)**, a statewide organization representing more than 5,000 library users, friends, and advocates.

First and foremost, libraries, regardless of their size or clientele, exist to provide timely, accurate, and accessible information. Telecommunications dramatically increases the amount of information available to users despite physical and geographical boundaries. No library, on its own, could begin to afford the wealth of resources now available electronically. That's why reduced rates are essential because they will enable libraries to fulfill their traditional mission in dynamic new ways.

The most significant role that libraries play by disseminating information is lifelong learning for its users. Libraries provide information that supplements students needs from preschool through graduate school. For adults not engaged in formal study, libraries are the most convenient and cost effective centers for lifelong learning.

Moreover, Pennsylvania has the largest rural population of any state in America. All too often, libraries in non-urban areas tend to be small and information poor. Telecommunications could be the great equalizer in allowing these libraries to adequately serve its users.

Sadly, too many library users in our state find their library to be poorly funded and inadequately staffed. But all of Pennsylvania's library users would, in fact, benefit from the Federal Communications Commission's interpreting the legislative intent of the Congress in a way that:

- **includes schools and libraries as universal service providers**
- **defines discounted rates for schools and libraries in the broadest possible way.**

Universal service and discounted rates for libraries and schools constitute essential prerequisites that will enable these institutions to ensure that all of Pennsylvania's citizens enjoy access to the information highway and the short and long-term benefits that flow from such access. That's because, in the real world, access does not come cheaply. Not everyone can afford their own access and, in fact, too many libraries cannot afford access at today's sky-high telecommunications rates.

Pennsylvania library budgets are insufficient to meet the increasingly sophisticated information and reading demands of their users. Nevertheless, Pennsylvania libraries are committed to networking for the purpose of providing the most information in the most effective manner possible. Unfortunately, progress in this area continues to be slow. In the Commonwealth only 9% of public schools have access to the Internet. Public library access is also significantly small. The state's proposed budget calls for a 4% increase in state aid for public libraries. While this was a generous increase when compared to the

flat or reduced funding level for most other state programs, it only provides for small incremental increases for existing public services, while not addressing expanding telecommunications needs.

We know from experience that investments in technology for libraries pays significant dividends. More and more, libraries find creative ways to maximize limited resources to improve information services.

In Montgomery County, Pennsylvania, a not-for-profit consortium, the Montgomery County Library and Information Network Consortium (Mc Linc), was formed by more than twenty public libraries. Mc Linc's mission is to provide shared automation services, including information via telecommunications. Recently, the county was split into two area codes. Ultimately, this will impact fees that may be leveled for public access to the Internet and shared reference services. It should be noted that Montgomery County is larger than four states; therefore, mileage fees for telecommunication services may exacerbate the impact of charges.

The Lower Merion Library System, located in suburban Philadelphia, recognizes the necessity of state of the art telecommunications technology to provide graphical, multi-media, digitized information. Dial-in access via analog lines is much too slow for patrons seeking information or access to the library holdings.

The Delaware County Library System, also in southeastern Pennsylvania, identifies the lack of a wide area calling option as a financial burden on libraries. An area electronic mail network has been established among the numerous county public libraries. Use of this network has greatly reduced the time to fill interlibrary loan requests from 5 to 3.4 days. Internet access is presently too expensive to offer as a public service. Future plans call for creating a wide area information network, but at this time the cost is too great.

Several years ago, a number of public libraries in the suburban Philadelphia area entered a cooperative with some of the city medical libraries. This cooperative provided fax machines which greatly facilitated the sharing of medical information with public library users. Providing medical information has become an increasingly important role of libraries. Obviously, this information is not useful if it is not from the most current reference sources. These sources are too expensive for most public libraries, but through telecommunications current information found by professionally trained medical reference librarians can be delivered in a timely, cost effective manner to every citizen in the state.

The Altoona Area Public Library has experienced a growing demand for full Internet access in the library. They provide free access for the public, now serving 190 visitors per month. The service began in September, 1995, and demand has grown each month since. The library emphasizes that free access is essential in their community since the majority of households do not own computers instead relying on their schools and libraries for access to the Internet.

The remaining 12 libraries in the three-county area around Altoona presently offer text-only access to the Internet but demand for a full graphics environment is growing. In order for the Altoona Library to provide this service for the smaller, nearby rural libraries, discounted telephone rates will be

essential because many of these libraries are located in different calling areas served by different telephone companies. Smaller libraries do not have the money to subsidize large telecommunications costs to keep up with technology, an ironic circumstance, indeed, since these smaller libraries stand to benefit the most from access to worldwide information sources.

The Dauphin County Library System located in and around the Harrisburg area serves a population of 210,000. As a district library center, it provides back up reference, interlibrary loan, and other information services to public libraries in four counties, representing a total service population of more than a half million people. To effectively serve this population, the system has moved toward the use of online information resources, some of which are locally loaded on its automated library system. While this is a cost-effective way to provide information, users and libraries located outside the local calling area must bear extra expenses in the form of toll calls to access these services. Smaller libraries and rural users, who stand to benefit the most from such access, are the most penalized because of their inability to economically dial into the library system's catalog and other electronic information resources. Discounted telephone rates would encourage more use of these resources by libraries and their users. To date, some grants have provided area libraries with computers, modems and fax machines. The critical missing link in this technological information infrastructure is reducing the high cost of long distance calls.

In Pennsylvania's K-12 classrooms and school libraries, one need not look far to see into the eyes of our state's, and indeed our nation's, future. These children confront a world of increasing complexity yet one where information and learning can be found literally at their fingertips. Learning how to use technology, how to search for information, and how then to convert information into learning opportunities represent some of the very real challenge facing students today.

Likewise, teachers and school library media specialists face the daunting task of keeping up with technology and passing on their expertise to students anxious to learn. In June of 1995, Pennsylvania's school librarians, in cooperation with the American Association of School Librarians, launched a new technology initiative entitled ICONnect, a program designed to introduce library media specialist, students, and teachers to learning resources available on the Internet. The program teaches participants the skills necessary to navigate the "information superhighway." Topics covered include online basics, curriculum advice, and online courses.

In schools across Pennsylvania, the educational opportunities made available to K-12 students are wide-ranging due to their access to telecommunications. Students, school library media specialists and teachers living in areas of the state where telecommunications and cable companies are competing for school district interest have access to the Internet and e-mail in a variety of ways.

School districts in Lancaster County are an excellent example. Ephrata School District, through a partnership with the local cable company has Internet access in every school building. Students and teachers alike have had the opportunity to retrieve current information and take "field trips" to foreign countries. Currently access is limited to one or two workstations per building, but plans to increase connectivity are in place. Some districts, including Cocalico School District, are fortunate enough to have access to the Internet through the Intermediate Unit #13 wide-area network. Once again, students

and teachers have e-mail capabilities, retrieve current news information, and have access to thousands of educational resources.

In the Tredyffrin/Easttown School District in another part of the state, high school students have access to the Internet through a contract with West Chester University. Hundreds of students have researched current Federal legislation, conducted daily stock market projects, and retrieved information on controversial topics for communications classes. This has served as an excellent opportunity for evaluation of resources, an important information management skill.

On the other hand, in Intermediate Unit #1, which encompasses Fayette, Washington and Greene Counties in Pennsylvania, 17 of the 25 school districts are in rural areas extremely hampered by their inability to connect to the information superhighway for the reasons which follow:

- cost of connectivity in relationship to their limited resources
- isolated locations where commercial cable and phone companies do not wish to invest in the infrastructure due to the limited population
- private and small independent phone companies that pass off costs to customers, costs that are substantially higher than those of regional and statewide providers.

Ultimately, the success of any of these initiatives depends upon broader access which brings the issue of affordability squarely into focus. Like public libraries, academic, and special libraries, school districts will not be able to afford the necessary and broader access to electronic information and learning without significantly discounted telecommunications rates. As indicated previously, only nine percent of Pennsylvania's public schools have access to the Internet (where access is defined as a least one connection somewhere in the building.) Alarming, 96% of all K-12 classrooms nationally do not even have a phone jack available. This "percentage of inaccessibility" is believed to be even higher in Pennsylvania's K-12 classrooms.

At college and university libraries, typically places where students have learned to use technology, they cannot begin to accommodate the demand for the full-range of learning resources available electronically. Without the broader access that discounted telecommunication rates would encourage, many of the resources and networks developed and shared by the academic libraries will go under-utilized because of high telecommunications costs.

Why are discounts on telecommunications costs so important for higher education? One reason is that telecommunications is so expensive. Michael Roberts, the vice-president of EDUCOM, recently noted that "[higher education's] aggregate telephone bills are on the order of \$2 billion a year." Add to that the cost of building and maintaining high speed data networks on campus, the new staff positions which are required when so many more computer accounts are provided to students, and the expense of purchasing and maintaining increasingly more desktop computers, and it is clear why costs related to telecommunications take up more and more of college and university budgets each year.

At the same time, while recognizing the increasing costs of telecommunications, it is also important to note how access to technology is dramatically changing and enhancing the missions of higher education. Telecommunications provides resources to under-served populations through distance educa-

tion and other programs for non-traditional students. It is used to work more closely with other institutions, whether K-12 schools, corporate workplaces, or other college and universities. And increasingly, telecommunications serves as an important channel of communications among students, between students and faculty, and among far-flung researchers.

As the Internet becomes more pervasive, colleges and universities must provide all members of the educational community with the capability of accessing resources as well as the training to use them efficiently and the education to critically examine and interpret the information found there. Discounts in telecommunications costs will allow higher education to direct more of its resources towards focusing on educational missions and outcomes.

Whether academic, public, special or school libraries, cooperation and sharing resources is not a new phenomenon for Pennsylvania libraries. Several years ago, a very successful library program was introduced in Pennsylvania in cooperation with the state's Department of Labor and Industry. Called *Workplace*, the initiative provided computers and software in select public libraries for those entering the workplace and those whose careers were in transition. Software for resume writing and careers was made accessible at no cost to users. Workplace made a difference in the lives of many displaced workers, and those seeking a new career. This effective program could be greatly expanded and connected electronically, but not until our currently high telecommunications rates are reduced significantly.

While it is clear through these previous examples that creative and cooperative uses have been made of on-line resource in Pennsylvania's libraries and schools, it is equally clear that much greater use has been stifled and held back by prohibitive costs, especially for essential telecommunications connections.

We believe, therefore, that it is incumbent upon the Federal Communications Commission to recognize the fundamental role that libraries and schools must play in the expanding the access to and use of the vast amount of information and learning available electronically. Toward that end, we respectfully urge the Commission to consider the vital role of libraries and schools as it sets standards for access and rates. Specifically, we respectfully request the following actions:

- 1. Include libraries and schools among those classified as universal service providers. Libraries and schools are not recipients of universal service benefits but, rather, institutional providers of public access.**
- 2. Define core universal services, at the very least, as the level of technology required for entry level access to the Internet.**
- 3. Provide discounted service for libraries and schools including all telecommunications services available commercially, by tariff, and through contract.**
- 4. Establish a discounted telecommunications service rate for libraries and schools that represents the wholesale price of the service, a price which should be the lowest cost available covering the actual, demonstrable cost of the service.**
- 5. Establish greater discounts for libraries and schools in rural and other higher cost areas in order for them to overcome the even-greater access obstacles they confront in the form of distance, poor infrastructure, and other factors**

**6. Require reasonable certification and eligibility criteria that is not overly burdensome. These criteria should provide accountability while including libraries and schools that participate in appropriate cooperative network arrangements.**

We in the library community in Pennsylvania appreciate this opportunity to offer our perspective on this very important matter. We strongly request that the Federal Communications Commission implement universal service and discounted rates for libraries and schools as defined above. We anxiously await your favorable decisions which, we trust, will go a long way toward expanding the accessibility and affordability of online resources for all Americans so that, as the Congress declared, "no one is barred from benefiting from the power of the Information Age."

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